

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOSEPH A. D'AVERSA, on behalf of himself and all others similarly situated,

Plaintiff,

v.

J. CREW GROUP, INC.; J. CREW OPERATING CORP.; J. CREW, INC.; J. CREW INTERNATIONAL, INC.; CHINOS HOLDINGS, INC.; CHINOS INTERMEDIATE HOLDINGS A, INC.; and CHINOS INTERMEDIATE HOLDINGS B, INC.,

Defendants.

Civil Action No. 1:16-cv-01590-DLC

**DECLARATION OF ANTHONY J.
ANSCOMBE IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS**

I, ANTHONY J. ANSCOMBE, declare under penalty of perjury:

1. I am a member of the firm of Sedgwick LLP, attorneys for Defendants J. Crew Group, Inc.; J. Crew Operating Corp.; J. Crew, Inc.; J. Crew International, Inc.; Chinos Holdings, Inc.; Chinos Intermediate Holdings A, Inc.; and Chinos Intermediate Holdings B, Inc. in the above-captioned action (collectively, J. Crew).

2. Attached as **Exhibit A** is a true and correct copy of Joseph A. D'Aversa's "Attorney Detail" sheet, from the New Jersey Courts' NJ Attorney Index website. Attached as **Exhibit B** is a true and correct copy of Joseph A. D'Aversa's profile on martindale.com, which shows that he is an associate at the D'Elia Law Firm, LLC, in Marlton, New Jersey.

3. My law firm conducted a "Person Search" using LexisNexis Accurint, an electronic database of public records related information. It is my understanding that Accurint extracts records from an extensive variety of sources, including consumer reporting agencies, courts,

county recorders, Secretaries of State, utilities, DMV and state licensing agencies, among other sources. The Comprehensive Report produced by Accurint shows that there is only one person named Joseph D'Aversa living in New Jersey, and that the Joseph A. D'Aversa is the who lives at 750 Grant Road, Mt. Laurel, NJ 08054 also works at the D'Elia Law Firm. A true and correct copy of the Comprehensive Report is attached as **Exhibit C**. To protect Plaintiff's privacy, personal information including social security numbers, addresses, the dates Plaintiff was associated with those addresses, phone numbers, places of employment, and birthdays have been redacted from the Report.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: April 29, 2016

s/ Anthony J. Anscombe
ANTHONY J. ANSCOMBE